

Debtor 1 Annette Margaret Shultz f/k/a Annette Margaret FranksDebtor 2 Charles William Shultz, Jr.
(Spouse, if filing)United States Bankruptcy Court for the: WESTERN District of: PA
(State)Case number 15-70198-JAD

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage InformationName of creditor: Citibank, N.A., not in its individual capacity but solely as
Owner Trustee of New Residential Mortgage Loan Trust 2019-RPL3
c/o Fay Servicing, LLCCourt claim no. (if known):
9

Last 4 digits of any number you use to identify the debtor's account:

8 9 6 3Property address: 242 Staff Street
Number StreetHeilwood PA 15745
City State ZIP Code**Part 2: Prepetition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 06/01/2020

MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$

b. Total fees, charges, expenses, escrow, and costs outstanding:

+ (b) \$

c. **Total.** Add lines a and b.

(c) \$

Creditor asserts that the debtor(s) are contractually
obligated for the postpetition payment(s) that first became
due on:

MM / DD / YYYY

Debtor 1

Annette Margaret Shultz f/k/a Annette Margaret Franks
First Name Middle Name Last Name

Case number (if known) 15-70198-JAD

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Bradley J. Osborne, Esquire Date 05/21/2020
Signature

Print Bradley J. Osborne, Esquire Title Attorney
First Name Middle Name Last Name

Company Hladik, Onorato & Federman, LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 298 Wissahickon Avenue
Number Street
North Wales, PA 19454
City State ZIP Code

Contact phone (215) 855- 9521

Email bosborne@hoflawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 15-70198-JAD
Annette Margaret Shultz f/k/a Annette	:	Chapter 13
Margaret Franks and Charles William	:	
Shultz, Jr.	:	
Debtors	:	
Citibank, N.A., not in its individual capacity	:	
but solely as Owner Trustee of New	:	
Residential Mortgage Loan Trust 2019-	:	
RPL3c/o Fay Servicing, LLC	:	
Movant	:	
vs.	:	
Annette Margaret Shultz f/k/a Annette	:	
Margaret Franks and Charles William	:	
Shultz, J	:	
Debtors/Respondents	:	
and	:	
Ronda J. Winnecour, Esquire	:	
Trustee/Respondent	:	

CERTIFICATE OF SERVICE

I, Bradley J. Osborne, Esq., hereby certify that I caused to be served true and correct copies of the **STATEMENT IN RESPONSE TO NOTICE OF FINAL CURE PAYMENT** at the respective last known address of each person set forth below on 05/21/2020:

David A. Colecchia, Esquire
Via ECF:
colecchia542@comcast.net
Attorney for Debtors

Ronda J. Winnecour, Esquire
Via ECF:
cmecf@chapter13trusteewdpa.com
Trustee

Annette Margaret Shultz
Charles William Shultz, Jr.
P.O. Box 75
Heilwood, PA 15745
Via First Class Mail
Debtors

Respectfully Submitted,

Date: 05/21/2020

/s/ Bradley J. Osborne, Esquire
Bradley J. Osborne, Esquire
Hladik, Onorato & Federman, LLP
Attorney I.D. # 312169
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North Wales, PA 19454
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